

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF NEW YORK

KORAN CHAMBERS

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-against-

DAVID J. KIRSCHNER; SEAN STEPHEN McNICOLAS;
MAXWELL STEPHEN PILLER, and JOSEPH KEEGAN

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names. Do not include addresses here.)

Complaint for Violation of Civil Rights

(Non-Prisoner Complaint)

Case No. _____
(to be filled in by the Clerk's Office)

Jury Trial: ☒ Yes ☐ No
(check one)

NOTICE

Federal Rules of Civil Procedure 5.2 addresses the privacy and security concerns resulting from public access to electronic court files. Under this rule, papers filed with the court should *not* contain: an individual's full social security number or full birth date; the full name of a person known to be a minor; or a complete financial account number. A filing may include *only*: the last four digits of a social security number; the year of an individual's birth; a minor's initials; and the last four digits of a financial account number.

Plaintiff need not send exhibits, affidavits, grievance or witness statements, or any other materials to the Clerk's Office with this complaint.

In order for your complaint to be filed, it must be accompanied by the filing fee or an application to proceed *in forma pauperis*.

CLERK'S OFFICE
MAY 22 2025 11:59

I. The Parties to This Complaint**A. The Plaintiff(s)**

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	<u>Koran Chambers</u>
Street Address	<u>104-09 189th Street</u>
City and County	<u>Saint Albans, Queens</u>
State and Zip Code	<u>New York 11412</u>
Telephone Number	<u>(718) 926-3606</u>
E-mail Address	<u>Betterlifechanges1@gmail.com</u>

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known) and check whether you are bringing this complaint against them in their individual capacity or official capacity, or both. Attach additional pages if needed.

Defendant No. 1

Name	<u>David J. Kirschner</u>
Job or Title (if known)	<u>Queens Co. Criminal Supreme Court Justice</u>
Street Address	<u>125-01 Queens Boulevard, Part K-23</u>
City and County	<u>Kew Gardens, Queens</u>
State and Zip Code	<u>New York 11415</u>
Telephone Number	<u>(718) 298-0456</u>
E-mail Address (if known)	<u>dkirschn@nycourts.gov</u>

Defendant No. 2

Name	Sean Anthony McNicolas
Job or Title	125-16c Queens Boulevard
(if known)	
Street Address	Kew Gardens
City and County	Queens, Queens
State and Zip Code	New York 11415
Telephone Number	(718) 261-0033
E-mail Address	seanlawoffice@yahoo.com
(if known)	

Defendant No. 3

Name	Maxwell Stephen Piller
Job or Title	Assistant District Attorney
(if known)	County of Queens
Street Address	125-55 Queens Boulevard
City and County	Kew Gardens, Queens
State and Zip Code	New York 11415-1520
Telephone Number	(718) 286-6000
E-mail Address	
(if known)	

Defendant No. 4

Name	Joseph Keegan, Shield No. 17824
Job or Title	New York Ctiy Police Detective
(if known)	113th Precinct, Queens
Street Address	167-02 Baisley Boulevard
City and County	Jamaica, Queens
State and Zip Code	New York 11434
Telephone Number	(718) 712-7733
E-mail Address	
(if known)	

Defendant No. 2

Name	<u>Sean Anthony McNicolas</u>
Job or Title	<u>125-16c Queens Boulevard</u>
(if known)	
Street Address	<u>Kew Gardens</u>
City and County	<u>Queens, Queens</u>
State and Zip Code	<u>New York 11415</u>
Telephone Number	<u>(718) 261-0033</u>
E-mail Address	<u>seanlawoffice@yahoo.com</u>
(if known)	

Defendant No. 3

Name	<u>Maxwell Stephen Piller</u>
Job or Title	<u>Assistant District Attorney</u>
(if known)	<u>County of Queens</u>
Street Address	<u>125-55 Queens Boulevard</u>
City and County	<u>Kew Gardens, Queens</u>
State and Zip Code	<u>New York 11415-1520</u>
Telephone Number	<u>(718) 286-6000</u>
E-mail Address	<u></u>
(if known)	

Defendant No. 4

Name	<u>Joseph Keegan, Shield No. 17824</u>
Job or Title	<u>New York Ctiy Police Detective</u>
(if known)	<u>113th Precinct, Queens</u>
Street Address	<u>167-02 Baisley Boulevard</u>
City and County	<u>Jamaica, Queens</u>
State and Zip Code	<u>New York 11434</u>
Telephone Number	<u>(718) 712-7733</u>
E-mail Address	<u></u>
(if known)	

II. Basis for Jurisdiction

Under 42 U.S.C. § 1983, you may sue state or local officials for the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” Under *Bivens v. Six Unknown Named Agents of Federal Bureau of Narcotics*, 403 U.S. 388 (1971), you may sue federal officials for the violation of certain constitutional rights.

A. Are you bringing suit against (*check all that apply*):

- ☒ State or local officials (a § 1983 claim)
☐ Federal officials (a *Bivens* claim)

B. Section 1983 allows claims alleging the “deprivation of any rights, privileges, or immunities secured by the Constitution and [federal laws].” 42 U.S.C. § 1983. If you are suing under section 1983, what federal constitutional or statutory right(s) do you claim is/are being violated by state or local officials?

Fourth, Sixth and Fourteenth Amendments prohibiting unlawful searches and seizures, abridging citizen privileges and immunities from fraudulent prosecution, and requiring effective assistance of counsel, which defendant McNicolas deprived me of by allowing defendant Keegan's perjured testimony to go unchallenged. Further, it is not within the purview of defendant Kirschner's judicial immunity to aid and abet perjury, not to preside over a blatantly fraudulent and illegal criminal proceeding, wherein the facts averred in the Fourth Count of the indictment charging Operating a Motor Vehicle with a Tinted Window do not establish the offense charged, nor probable cause for the resulting search and seizure based on the traffic stop. The same applies to defendant Piller for prosecuting a criminal case he knows and/or should know to be illegal.

D. Section 1983 allows defendants to be found liable only when they have acted “under color of any statute, ordinance, regulation, custom, or usage, of any State or Territory or the District of Columbia.” 42 U.S.C. § 1983. If you are suing under section 1983, explain how each defendant acted under color of state or local law. If you are suing under *Bivens*, explain how each defendant acted under color of federal law. Attach additional pages if needed.

The defendants, acting individually and in concert under color of state law, are prosecuting me under Queens Co. Ind. #73253/22, in violation of my right to a preliminary hearing under Sec. 100.05 and Article 180 of the NY CPL, and are knowingly and intentionally allowing me to be prosecuted upon a jurisdictionally defective indictment obtained by perjured testimony, in violation of the 4th, 6th and 14th Amendments, as I was subjected to an illegal search and seizure due to an illegal traffic stop.

III. Statement of Claim

State as briefly as possible the facts of your case. Describe how each defendant was personally involved in the alleged wrongful action, along with the dates and locations of all relevant events. You may wish to include further details such as the names of other persons involved in the events giving rise to your claims. Do not cite any cases or statutes. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

- A. Where did the events giving rise to your claim(s) occur?

Queens County Criminal Court

125-01 Queens Boulevard

Kew Gardens, New York 11415

- B. What date and approximate time did the events giving rise to your claim(s) occur?

October 19, 2022 through May 2025

- C. What are the facts underlying your claim(s)? *(For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?)*

On October 19, 2022, Plaintiff was subjected to a traffic stop by defendant Keegan for driving with window tints, which is not a traffic violation nor a crime, nor was defendant Keegan on patrol for traffic violations. After the traffic stop, defendant Keegan noticed that the front license plate to Plaintiff's vehicle was missing, which Plaintiff explained had fallen off and had in his possession. The traffic stop turned into an illegal search and seizure resulting in Plaintiff being arrested for possessing a firearm. Plaintiff was arraigned upon an unsworn felony complaint in violation of the 4th and 14th Amendments, which require an oath or affirmation (the latter of which can be made only by a prosecuting attorney), and was never informed of nor provided a preliminary hearing mandated by CPL Article 180, and was illegally indicted in violation of CPL 100.05 upon the perjured testimony of defendant Keegan, who falsely testified that he stopped Plaintiff for both tinted windows and a missing front license plate, the latter being noticed only after, not before the traffic stop (see attached Certified Transcription of Bodycam; Grand Jury Testimony and Jurisdictionally Defective Indictment).

IV. Injuries

If you sustained injuries related to the events alleged above, describe your injuries and state what medical treatment, if any, you required and did or did not receive.

Severe mental and emotional trauma, pain and anguish resulting from being illegally
arrested and deprived of a mandatory preliminary hearing required under Article 180
of the CPL, resultng in a jurisdictionally defective indictment that was filed in violation
of CPL 100.05 and the perjured testimony of defendant Keegan, and in vliotion of my
rights under the 4th and 14th Amendments. Also, the Fourth Count of the indictment
alleging a window tint violation under NY Vehicle and Traffic Law Sec. 375 (12-a and
b) does not aver facts constituting the offense charged, in that the facts allege only that
a rear window was tinted, which does not constitute a traffic offense and violates Subd.
7(a) of CPL 200.50 .

V. Relief

State briefly what you want the court to do for you. Make no legal arguments. Do not cite any cases or statutes. If requesting money damages, include the amounts of any actual damages and/or punitive damages claimed for the acts alleged. Explain the basis for these claims.

I request that the Court award me \$250 Million in compensatory and punative damages
against the defendants in their individual and official capacities for severe mental and
emotional pain, suffering and distress, and for engaging in a criminal conspiracy to
deprive me of liberty without due process of law, and for subjecting me to a fraudulent
criminal prosecution based upon perjured testimony, an illegal traffic stop, and an illegal
search and seizure in violation of my 4th and 14th Amendment rights under the United
States Constitution.

VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: May 21, , 2025

Signature of Plaintiff

The image shows a handwritten signature in black ink, which appears to be 'Kor' followed by a stylized flourish, written over a horizontal line.

Printed Name of Plaintiff Koran Chambers

ATTACHMENTS

CERTIFIED BODYCAM TRANSCRIPTION

CRIMINAL SUPREME COURT OF THE STATE OF NEW YORK
COUNTY OF QUEENS

-----X

IN THE MATTER(S) OF:

THE PEOPLE OF THE STATE OF NEW YORK,

Indictment No.
73253-2022

Vs.

KORAN CHAMBERS,

Defendant.

-----X

October 19, 2022

Transcript of: Police Body Cam of Car Stop
2022-10-19 44-27-0400 9AXON BODY 3

Digital Recording, Transcribed by:
SONYA LEDANSKI HYDE

Veritext Legal Solutions
330 Old Country Road - Suite 300
Mineola, NY 11501

People of the State of New York / Chambers 10/19/2022
PROCEEDINGS

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1 OFFICER JOSEPH KEEGAN: Roll the window down
2 for us?

3 KORAN CHAMBERS: No, it don't work.

4 OFFICER JOSEPH KEEGAN: All right, just pop the
5 door, then?

6 KORAN CHAMBERS: (Inaudible).

7 OFFICER JOSEPH KEEGAN: How's it going, man?

8 KORAN CHAMBERS: Good.

9 OFFICER JOSEPH KEEGAN: Do you have your
10 driver's license and registration on you? Where's it at?

11 KORAN CHAMBERS: In the back.

12 OFFICER JOSEPH KEEGAN: All right. That's all
13 right. You can bring it out. The reason I stopped you
14 is for the window tints.

15 KORAN CHAMBERS: For the window tints?

16 OFFICER JOSEPH KEEGAN: Yeah. You ever get
17 pulled over for that?

18 KORAN CHAMBERS: (Inaudible).

19 OFFICER JOSEPH KEEGAN: Say it again?

20 KORAN CHAMBERS: I said, I got in the car. It
21 had it like this. I don't know how to get them off.

22 OFFICER JOSEPH KEEGAN: All right, I got you.
23 What are you up to tonight?

24 KORAN CHAMBERS: I'm (inaudible).

25 OFFICER JOSEPH KEEGAN: Okay, where are you

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PROCEEDINGS

3

1 coming from?

2 KORAN CHAMBERS: (Inaudible).

3 OFFICER JOSEPH KEEGAN: (Inaudible) house?

4 KORAN CHAMBERS: Yeah.

5 OFFICER JOSEPH KEEGAN: All right. Do me a
6 favor, just hang out real quick, all right? Yo, where's
7 the front plate at?

8 POLICE OFFICER 1: (Inaudible)?

9 OFFICER JOSEPH KEEGAN: Yeah. Oh, you got it?

10 POLICE OFFICER 1: It fell off, or -- okay, all
11 right, you got to get out of the car.

12 POLICE OFFICER 2: Yeah, you got to get out of
13 the car. (Inaudible).

14 POLICE OFFICER 3: All right. (Inaudible).

15 POLICE OFFICER 2: What?

16 POLICE OFFICER 3: (Inaudible).

17 POLICE OFFICER 2: I got (inaudible).

18 OFFICER JOSEPH KEEGAN: Yeah, you got to wait,
19 my man.

20 POLICE OFFICER 2: I will do that. (Inaudible)
21 good for your hair. No, get rid of baldness. Don't do
22 that. My friend did that (inaudible) growing out so bad.

23 POLICE OFFICER 3: (Inaudible).

24 POLICE OFFICER 2: Where are you going from?

25 Where are you coming from? (Inaudible)? Okay,

14
People of the State of New York / Chambers 10/19/2022
PROCEEDINGS

4

1 (inaudible). Yeah, no, we (inaudible). We do
2 (inaudible) other guy, (inaudible) now, but (inaudible),
3 all right? (Inaudible). You got to do what you got to
4 do, (inaudible).

5 You got my buddy (inaudible). He's rolling in
6 the money. It's just automatic. You're on the road
7 (inaudible), everything, it's good money. It's dirty
8 work but it's clean money. (Inaudible).

9 OFFICER JOSEPH KEEGAN: Koran? When was the
10 last time you got in trouble on this car?

11 KORAN CHAMBERS: On this car?

12 OFFICER JOSEPH KEEGAN: Yeah.

13 KORAN CHAMBERS: Meaning what?

14 OFFICER JOSEPH KEEGAN: Just in general.

15 KORAN CHAMBERS: I mean --

16 OFFICER JOSEPH KEEGAN: You got arrested while
17 driving this car.

18 KORAN CHAMBERS: Arrested?

19 OFFICER JOSEPH KEEGAN: Yeah.

20 KORAN CHAMBERS: No. Never arrested.

21 OFFICER JOSEPH KEEGAN: Anyone else arrested
22 while driving this car?

23 KORAN CHAMBERS: No.

24 OFFICER JOSEPH KEEGAN: These plates?

25 KORAN CHAMBERS: These plates? No, I don't

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PROCEEDINGS

5

1 know. This is my car.

2 OFFICER JOSEPH KEEGAN: When did you get the
3 car?

4 KORAN CHAMBERS: This car, probably about a
5 year now ago.

6 OFFICER JOSEPH KEEGAN: Okay. Yeah, I just see
7 some arrests associated with the car. That's why I'm
8 asking you.

9 KORAN CHAMBERS: What kind of arrests
10 (inaudible).

11 OFFICER JOSEPH KEEGAN: I'm asking you, because
12 they come off on here. That's why I was just asking you.

13 POLICE OFFICER 2: When'd you buy the car?

14 KORAN CHAMBERS: I bought it a year ago.

15 OFFICER JOSEPH KEEGAN: All right. Do you have
16 the registration for it?

17 KORAN CHAMBERS: Registration the window. I
18 got the -- insurance ought to be (inaudible).

19 OFFICER JOSEPH KEEGAN: All right. Do you want
20 to check for the insurance (inaudible)? It's not in the
21 glove box?

22 KORAN CHAMBERS: No, no, no.

23 OFFICER JOSEPH KEEGAN: When'd you get a
24 ticket?

25 KORAN CHAMBERS: (Inaudible).

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PROCEEDINGS

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1 OFFICER JOSEPH KEEGAN: Who wrote you that?

2 KORAN CHAMBERS: (Inaudible).

3 OFFICER JOSEPH KEEGAN: And what?

4 KORAN CHAMBERS: (Inaudible).

5 OFFICER JOSEPH KEEGAN: Okay, Koran, while
6 you're looking for that, why don't you just step out?

7 KORAN CHAMBERS: (Inaudible), I got the
8 insurance right here, bro.

9 OFFICER JOSEPH KEEGAN: That's fine. You can
10 just step out. I just want to talk to you real quick.

11 KORAN CHAMBERS: (Inaudible)?

12 OFFICER JOSEPH KEEGAN: Boss, just do me a
13 favor, just step out of the car. I want to talk to you,
14 all right? It's just -- for my safety, I want to
15 continue the traffic stop talking out here.

16 KORAN CHAMBERS: Why?

17 POLICE OFFICER: Yeah, it'll take two seconds,
18 come on.

19 KORAN CHAMBERS: Yeah, but why, though?

20 OFFICER JOSEPH KEEGAN: Boss man, on any car
21 stop, we're allowed you to step out of the vehicle just
22 for our safety, okay? And if you don't have the
23 registration and all this stuff for the car and I have to
24 continue to -- continue the traffic stop, I'd rather --

25 KORAN CHAMBERS: -- in the window, Officer.

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PROCEEDINGS

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1 OFFICER JOSEPH KEEGAN: I understand.

2 KORAN CHAMBERS: And my insurance card is right
3 here, so what am I stepping out for?

4 OFFICER JOSEPH KEEGAN: You don't have the
5 registration paperwork on you. I understand the
6 registration's in the car, and I asked you before, when I
7 came up here. I said, you know, you've got the tints on
8 the car. You mentioned nothing about the tickets. I
9 just want to talk to you outside the car, that's all. It
10 shouldn't be a problem, bro. You're going to be out here
11 -- you're going to be on your way in two seconds. Is
12 there any issues going on?

13 KORAN CHAMBERS: I'm -- no, there's not -- no
14 issues. I'm just saying, I've been sitting right here
15 for mad long, bro.

16 OFFICER JOSEPH KEEGAN: All right.

17 KORAN CHAMBERS: Come on, man.

18 OFFICER JOSEPH KEEGAN: We'll have you out of
19 here in two seconds, all right? You got nothing on you?

20 KORAN CHAMBERS: No. What do you --

21 OFFICER JOSEPH KEEGAN: Nothing man. Just
22 talking to you, all right? That's all.

23 POLICE OFFICER 2: (Inaudible).

24 POLICE OFFICER 3: Put yourself against the
25 bumper. That's all we want.

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PROCEEDINGS

8

1 OFFICER JOSEPH KEEGAN: Okay, just keep your
2 hands out of your pocket. (Inaudible) search you quick
3 or --

4 KORAN CHAMBERS: Sir, I'm --

5 OFFICER JOSEPH KEEGAN: Just keep your hands
6 out of your pockets while we're talking, okay?

7 KORAN CHAMBERS: (Inaudible) search the car?

8 OFFICER JOSEPH KEEGAN: No, no, I'm not
9 searching the car. I'm just running the registration.
10 It's just safer for me to have you stand back here with
11 my partner while I'm doing that.

12 POLICE OFFICER 2: He's going to make sure the
13 VIN number on the door matches the dashboard.

14 OFFICER JOSEPH KEEGAN: That's it.

15 KORAN CHAMBERS: All right.

16 POLICE OFFICER: (Inaudible).

17 OFFICER JOSEPH KEEGAN: It's no big deal.

18 POLICE OFFICER 2: (Inaudible) -- I'm not
19 saying you, but we've had issues where w4e've done this
20 (inaudible). All right? You'll be out of here in two
21 seconds. (Inaudible). You got your (inaudible) yet or
22 not yet?

23 There's not (inaudible). He's not looking in
24 your car. Do you mind if he checks the car, make sure
25 there's no weapons or anything like that? What was that?

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PROCEEDINGS

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1 OFFICER JOSEPH KEEGAN: What'd he say,
2 (inaudible)? Your answer, brother?

3 KORAN CHAMBERS: What?

4 OFFICER JOSEPH KEEGAN: Listen, the VIN's not
5 coming back right now when I searched it, all right?

6 KORAN CHAMBERS: What do you mean, it's not
7 coming back? What do you want me to do? I don't --

8 POLICE OFFICER 2: Is this plate your -- is
9 this plate legit?

10 KORAN CHAMBERS: Yes, the car is registered
11 (inaudible).

12 OFFICER JOSEPH KEEGAN: All right, let me
13 (inaudible) real quick on him. Yeah, you want to just
14 keep working on that?

15 POLICE OFFICER 2: Yeah.

16 OFFICER JOSEPH KEEGAN: Let me just talk to you
17 real quick, all right? We're being completely cordial
18 with you, right?

19 KORAN CHAMBERS: Right.

20 OFFICER JOSEPH KEEGAN: All right, I got no
21 reason to give you a hard time or anything --

22 POLICE OFFICER 2: This window doesn't open,
23 right? This window --

24 OFFICER JOSEPH KEEGAN: Yeah, you said that
25 window doesn't open?

1 KORAN CHAMBERS: No.

2 OFFICER JOSEPH KEEGAN: All right. My man.
3 Little things, indicators to me when I'm on a traffic
4 stop, you know, it can either raise my suspicion, lower
5 my suspicion, okay? I'm being totally cordial with you,
6 calm right now.

7 Every little questions I ask you, little things
8 like in the beginning about why I pulled you over and
9 stuff like that, and you got tickets. The only thing you
10 mention that to me right off the bat, that you got two
11 tickets for -- okay, Officer, I already got pulled over
12 today for no front plate.

13 KORAN CHAMBERS: No, I didn't get pulled over.
14 That was when the car was parked. Okay?

15 OFFICER JOSEPH KEEGAN: That was parking
16 tickets? Okay. Either way, all right? And then, I'm
17 trying to talk to you really nice. I'm not, you know,
18 not being mean or anything like that. I asked you to
19 step out of the car and you're kind of being a little
20 apprehensive with me, okay?

21 That's what's making us a little apprehensive,
22 a little -- more -- raises my suspicion a little, so I
23 asked you to step out of the car. Now I'm talking to you
24 back here, and you seem very uneasy. You're dripping
25 sweat right now, profusely, and it's cold out.

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PROCEEDINGS

1 KORAN CHAMBERS: All right, (inaudible) you got
2 the lights in my eyes (inaudible).

3 OFFICER JOSEPH KEEGAN: I hear you, man, but
4 what's going on right now? what's really going on?

5 KORAN CHAMBERS: Nothing going on, may.

6 OFFICER JOSEPH KEEGAN: All right. Well,
7 normal -- normally people won't be sweating when it's 40
8 degrees out, 40-something degrees out. It's a little
9 chilly tonight. And the VIN's not coming back right
10 away.

11 KORAN CHAMBERS: Run the plate. Does the plate
12 come to my name --

13 OFFICER JOSEPH KEEGAN: Yeah, yeah, it does.
14 It does. That's why I was trying to make sure
15 everything's legit, okay?

16 KORAN CHAMBERS: All right.

17 OFFICER JOSEPH KEEGAN: I'm going to ask you
18 one more time, do you mind if we search your car? I can
19 -- like I said before, I could only search your car if
20 you give me consent. That's why I'm asking you.

21 KORAN CHAMBERS: No, (inaudible).

22 OFFICER JOSEPH KEEGAN: Okay.

23 KORAN CHAMBERS: (Inaudible).

24 OFFICER JOSEPH KEEGAN: What's that?

25 KORAN CHAMBERS: I (inaudible).

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PROCEEDINGS

1 OFFICER JOSEPH KEEGAN: Yes, it's going to be
2 two seconds and then I'll get you out of here, okay?

3 KORAN CHAMBERS: Okay.

4 OFFICER JOSEPH KEEGAN: Do you have the
5 license?

6 POLICE OFFICER 2: Yeah, (inaudible).

7 POLICE OFFICER: Yeah, (inaudible).

8 POLICE OFFICER 2: It's good, it's good. I got
9 it. No, it came back. The DMV's all jacked up, so
10 sometimes it (inaudible). Sometimes, we've got to do it
11 two, three times.

12 OFFICER JOSEPH KEEGAN: I'm trying to get the
13 client ID, but it's not coming up. (Inaudible)?

14 POLICE OFFICER 2: (Inaudible).

15 OFFICER JOSEPH KEEGAN: Yeah, why don't you try
16 one more time? I'm showing your license right now,
17 that's all. All right?

18 POLICE OFFICER 2: Do you have a license plate?

19 OFFICER JOSEPH KEEGAN: That's all. Mr.
20 Chambers, what's going on?

21 POLICE OFFICER 2: If there's something you
22 need to tell us, now's the time.

23 OFFICER JOSEPH KEEGAN: Yeah. All right, I'm
24 trying to run your license right now, it's the last thing
25 I'm going to do, but I can't be sitting here and not

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PROCEEDINGS

1 asking you questions while you're sweating profusely,
2 bro. Keep it real with us, all right?

3 POLICE OFFICER 2: You got something you're not
4 supposed to have?

5 KORAN CHAMBERS: (Inaudible) shit, bro.

6 OFFICER JOSEPH KEEGAN: All right, let me ask
7 you. What's going on with your jeans down there, boss
8 man? (Inaudible). All right.

9 POLICE OFFICER: (Inaudible).

10 OFFICER JOSEPH KEEGAN: All right, all right.
11 All right, chill out, chill out. We got it. Don't
12 fucking reach. Don't even move. All right?

13 KORAN CHAMBERS: (Inaudible) lights.

14 OFFICER JOSEPH KEEGAN: You got him cuffed?
15 Get him cuffed first.

16 POLICE OFFICER: I got him cuffed.

17 OFFICER JOSEPH KEEGAN: Just get the hands
18 cuffed. I got it.

19 KORAN CHAMBERS: (Inaudible).

20 POLICE OFFICER: (Inaudible).

21 OFFICER JOSEPH KEEGAN: All right, yeah, we're
22 going to (inaudible). Just don't move, all right?

23 KORAN CHAMBERS: (Inaudible).

24 POLICE OFFICER: (Inaudible)?

25 OFFICER JOSEPH KEEGAN: Yeah, yeah, yeah.

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1 POLICE OFFICER: (Inaudible).

2 OFFICER JOSEPH KEEGAN: (Inaudible).

3 POLICE OFFICER: (Inaudible).

4 POLICE OFFICER: That's why I asked you, man.
5 Just be honest. Just be cool with us. We're being
6 straight with you, haven't we?

7 KORAN CHAMBERS: (Inaudible).

8 POLICE OFFICER: All right, it's all good.
9 Relax.

10 OFFICER JOSEPH KEEGAN: I got to unbutton these
11 pants. I don't want to let go.

12 KORAN CHAMBERS: (Inaudible).

13 OFFICER JOSEPH KEEGAN: All right, bro. It's
14 all --

15 KORAN CHAMBERS: I'm good, bro. I'm good, bro.

16 OFFICER JOSEPH KEEGAN: Be careful.

17 POLICE OFFICER: This is (inaudible).

18 OFFICER JOSEPH KEEGAN: Yeah, give me a light,
19 give me a light, Joe, give me a light, (inaudible).

20 KORAN CHAMBERS: (Inaudible).

21 POLICE OFFICER: (Inaudible).

22 OFFICER JOSEPH KEEGAN: Just (inaudible).

23 POLICE OFFICER 2: Yeah, we're good.

24 KORAN CHAMBERS: (Inaudible).

25 OFFICER JOSEPH KEEGAN: Just (inaudible) him

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1 again, make sure there's nothing else.

2 KORAN CHAMBERS: (Inaudible) good, bro.

3 (Inaudible) good. (Inaudible).

4 POLICE OFFICER 2: No, you're good, you're
5 good.

6 POLICE OFFICER 3: Yeah, yeah.

7 KORAN CHAMBERS: (Inaudible), bro. I was doing
8 good, bro.

9 POLICE OFFICER 3: It's not a big deal.

10 KORAN CHAMBERS: I was doing mad good, bro.
11 (Inaudible). I'm good, bro. I was doing good, bro.

12 OFFICER JOSEPH KEEGAN: He's cuffed good?

13 POLICE OFFICER 3: Yeah.

14 KORAN CHAMBERS: (Inaudible), bro. I am good,
15 bro.

16 POLICE OFFICER 2: It's not a big deal.

17 KORAN CHAMBERS: It is, bro, it is, bro.

18 (Inaudible) bro, I ain't been in trouble in mad long,
19 bro. I just --

20 POLICE OFFICER 3: Hold this.

21 KORAN CHAMBERS: Did all my fucking -- did
22 time, bro. Now I got to do this time again, bro. Time
23 again, bro. Again, bro. This is dumb shit, bro.

24 POLICE OFFICER 2: You got anything else,
25 (inaudible) there?

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1 KORAN CHAMBERS: No, sir. Bro, that's it, bro.
2 You all got it.

3 POLICE OFFICER 2: That's it?

4 KORAN CHAMBERS: That's it, brother.

5 OFFICER JOSEPH KEEGAN: That's it? You don't
6 have anything else on you?

7 KORAN CHAMBERS: They got it, bro. They got
8 it. That's it.

9 POLICE OFFICER 3: They're coming. They're
10 coming (inaudible).

11 OFFICER JOSEPH KEEGAN: Just wait for them to
12 get here and then we'll (inaudible).

13 POLICE OFFICER 2: Couple (inaudible) division?

14 POLICE OFFICER 3: Yeah, I got it. I got it.
15 I got it.

16 POLICE OFFICER: Just going to go over to
17 public safety.

18 OFFICER JOSEPH KEEGAN: I mean, you don't even
19 got to -- oh, yeah.

20 POLICE OFFICER 2: (Inaudible).

21 OFFICER JOSEPH KEEGAN: All right.

22 POLICE OFFICER 2: Just wherever you were going
23 to put that, they can work on it.

24 OFFICER JOSEPH KEEGAN: Yeah.

25 KORAN CHAMBERS: (Inaudible), bro. Fuck.

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1 Fucked my life up, just now, bro.

2 POLICE OFFICER 2: (Inaudible).

3 KORAN CHAMBERS: Fucked my life up. It's just
4 not -- it's not all good, bro. I just fucked my life up,
5 bro. just fucked my life up, bro. (Inaudible). Oh man.
6 What am I looking at now, fellas? What am I looking at
7 now?

8 POLICE OFFICER 2: What's going to happen now?
9 We're taking you back to the precinct.

10 KORAN CHAMBERS: How much time we looking at,
11 thought?

12 POLICE OFFICER 2: Honestly? I can't -- don't
13 --

14 OFFICER JOSEPH KEEGAN: Yeah, we're not --

15 KORAN CHAMBERS: I got --

16 OFFICER JOSEPH KEEGAN: Don't even sweat that
17 right now.

18 POLICE OFFICER 2: Don't even worry about that.

19 KORAN CHAMBERS: I need to. I got to start
20 thinking about my time. I can't really --

21 POLICE OFFICER 2: Yeah, I told them we need
22 transport. So, they'll come. They're going to bring it
23 back to the precinct and then we'll bring the car back,
24 too.

25 KORAN CHAMBERS: Can't even fucking -- can't

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1 even play (inaudible). I got to start thinking about
2 time.

3 POLICE OFFICER: Listen. Turn around.

4 KORAN CHAMBERS: I fucked up, bro. I should've
5 never had -- never been like this, bro. Never been like
6 this, bro. I fucked up, bro.

7 OFFICER JOSEPH KEEGAN: I appreciate you being
8 cooperative, though, We appreciate that.

9 POLICE OFFICER 2: From this point forward,
10 listen, we treat you with respect, you treat us with
11 respect, and we're going to get -- we're going to make
12 this nice and easy, all right? All right, we'll get you
13 down to court, we'll get it all done. You'll be out
14 tomorrow. All right?

15 POLICE OFFICER: Let's give him another toss
16 real quick, all right?

17 POLICE OFFICER 3: Just give another toss.

18 OFFICER JOSEPH KEEGAN: Can we get someone to
19 bring the car back?

20 POLICE OFFICER: Yes. They're coming.

21 POLICE OFFICER 2: Turn around? Just turn
22 right.

23 POLICE OFFICER: It's all good. It's all good.

24 POLICE OFFICER 2: That have you been collared
25 for? What's your last arrest for? For this?

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1 KORAN CHAMBERS: (Inaudible).

2 POLICE OFFICER 2: Only this?

3 KORAN CHAMBERS: No.

4 POLICE OFFICER 2: First one? You'll be all
5 right. You'll be all right. Listen, shit happens. All
6 right? You'll be all right.

7 OFFICER JOSEPH KEEGAN: (Inaudible)?

8 POLICE OFFICER 2: He said two minutes.

9 OFFICER JOSEPH KEEGAN: All right. Call
10 (inaudible).

11 POLICE OFFICER 2: Yeah, well --

12 OFFICER JOSEPH KEEGAN: (Inaudible) 113, right?

13 POLICE OFFICER 3: Yeah?

14 POLICE OFFICER: Yeah.

15 POLICE OFFICER: Yeah.

16 POLICE OFFICER 2: We want 113.

17 OFFICER JOSEPH KEEGAN: (Inaudible) start
18 sweating.

19 KORAN CHAMBERS: I just knew. I just knew. I
20 just knew. I knew. Soon as I seen you, I just knew.
21 (Inaudible).

22 OFFICER JOSEPH KEEGAN: (Inaudible) that.

23 KORAN CHAMBERS: I'm trying to move, bro. I
24 swear to God, bro. I've been trying to move, (inaudible)
25 and move, bro. I want to be able to -- because the way I

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1 live now --

2 POLICE OFFICER: Where do you live?

3 KORAN CHAMBERS: (Inaudible) I'm doing better
4 than these niggas out here and these fucking petty ass
5 fuckers out here, you feel me? I want to be -- I want to
6 move.

7 POLICE OFFICER 2: Make this it's your last --
8 make this your last --

9 KORAN CHAMBERS: I want to move, bro. I want
10 to be moved. I want to have my own legit shit. I don't
11 want to ever have to (inaudible) --

12 POLICE OFFICER: So, do this. Make this your
13 last day.

14 KORAN CHAMBERS: -- I can't even -- I'm never -
15 - I'm never going to be able to do this. I'm never going
16 to be able to get legit shit, man.

17 POLICE OFFICER 2: It's all good. (Inaudible)
18 stuff in your pocket? These guys are going to bring you
19 back to the precinct for us. We'll get you (inaudible),
20 all right?

21 POLICE OFFICER: We'll meet you there with all
22 your stuff. Just take everything out.

23 POLICE OFFICER 2: Yeah.

24 OFFICER JOSEPH KEEGAN: (Inaudible). Got to
25 bring him back. When I called, he was sweating.

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1 (Inaudible).

2 POLICE OFFICER: (Inaudible).

3 POLICE OFFICER 3: What's up?

4 POLICE OFFICER: (Inaudible).

5 POLICE OFFICER 3: Yeah, I'll (inaudible) the
6 car. We got keys for it? Are they in there?

7 POLICE OFFICER: Are they in your pocket?

8 POLICE OFFICER 2: Keys should be in it.

9 POLICE OFFICER: Yeah.

10 POLICE OFFICER 2: And should still be running,
11 too.

12 POLICE OFFICER: Yeah, yeah, yeah.

13 POLICE OFFICER 2: Put him in your car or?

14 KORAN CHAMBERS: (Inaudible).

15 POLICE OFFICER 2: Yeah, put him in our car.

16 All right.

17 POLICE OFFICER: (Inaudible).

18 OFFICER JOSEPH KEEGAN: Yeah, he's (inaudible).

19 POLICE OFFICER: I got it.

20 POLICE OFFICER: What's this, the 105?

21 OFFICER JOSEPH KEEGAN: This is the 113.

22 POLICE OFFICER: Mikey (inaudible).

23 POLICE OFFICER: Yeah, you want to, just, on
24 the way there, (inaudible)?

25 OFFICER JOSEPH KEEGAN: Already on is, big guy.

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1 POLICE OFFICER: I don't know why I doubt you,
2 bro.

3 OFFICER JOSEPH KEEGAN: Hey, what's going on,
4 man? This is Officer Keegan from Queens Auto Larceny.
5 Not much. I'm on 190 and Linden. We got a (inaudible),
6 but we're heading back to 113 on this person. Yeah.
7 (Inaudible). No, (inaudible). yeah, about -- yeah,
8 probably like, 15 minutes we'll be there. Yeah. Yeah,
9 we're with Auto Larceny.

10 POLICE OFFICER: I'll just follow you.

11 POLICE OFFICER: All right, you put it over,
12 right?

13 OFFICER JOSEPH KEEGAN: Yeah, hello? Yeah.
14 2991. Just want to write that down?

15 POLICE OFFICER: (Inaudible).

16 POLICE OFFICER: 29 -- they'll give it to you
17 when you get there. 2991.

18 POLICE OFFICER: All right, I got it.

19 OFFICER JOSEPH KEEGAN: All right, thanks.

20 POLICE OFFICER: (Inaudible).

21 OFFICER JOSEPH KEEGAN: What's up?

22 POLICE OFFICER: (Inaudible).

23 OFFICER JOSEPH KEEGAN: Yeah, I think so.

24 POLICE OFFICER: They'll give it to you when
25 you get there. We don't really need it now.

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1 POLICE OFFICER: (Inaudible).

2 OFFICER JOSEPH KEEGAN: That guy was so -- I
3 couldn't hear him (inaudible). I think Sergeant Bower.
4 I think so.

5 POLICE OFFICER: Was it in his pants?
6 (Inaudible).

7 OFFICER JOSEPH KEEGAN: Yeah. So, I'm -- yeah,
8 I'm staying live. You guys want to stay live until you
9 get back or --

10 POLICE OFFICER: Yeah, we just keep in on until
11 we get to the precinct.

12 OFFICER JOSEPH KEEGAN: Yeah.

13 POLICE OFFICER: Just so it shows that we're
14 transporting him.

15 OFFICER JOSEPH KEEGAN: Yeah, so (inaudible).

16 POLICE OFFICER: You're not planting it on him.

17 OFFICER JOSEPH KEEGAN: Yeah.

18 POLICE OFFICER: This fucking dude.

19 (Inaudible). We'll see you soon. Who's taking him?

20 OFFICER JOSEPH KEEGAN: Me.

21 POLICE OFFICER: Yeah, just go in, (inaudible).

22 OFFICER JOSEPH KEEGAN: Okay.

23 POLICE OFFICER: That's all you really need to
24 do right now.

25 OFFICER JOSEPH KEEGAN: All right, cool.

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1 POLICE OFFICER: (Inaudible). Joe (inaudible)
2 over here, too. I mean -- yeah, Joe.

3 OFFICER JOSEPH KEEGAN: Sorry (inaudible). Do
4 you know if Murray (inaudible) or --

5 POLICE OFFICER: What's that?

6 OFFICER JOSEPH KEEGAN: Did you hear if Murray
7 got another time or --

8 POLICE OFFICER: I don't know if anybody put it
9 over, but (inaudible).

10 POLICE OFFICER: I didn't hear.

11 OFFICER JOSEPH KEEGAN: Yeah, I think
12 (inaudible).

13 POLICE OFFICER: That your work phone?

14 POLICE OFFICER: (Inaudible).

15 OFFICER JOSEPH KEEGAN: 158280. (Inaudible).

16 Thank you.

17 POLICE OFFICER: I'm going to send you the CAD.
18 Just got to print it out.

19 OFFICER JOSEPH KEEGAN: All right, thanks.

20 POLICE OFFICER: What's your email?

21 OFFICER JOSEPH KEEGAN: It's Joseph. J-O-S-E-
22 P-H. Dot Keegan. K-E-E-G-A-N. At NYPD.org.

23 POLICE OFFICER: You're not (inaudible), too?

24 OFFICER JOSEPH KEEGAN: No.

25 POLICE OFFICER: Throw (inaudible). Keep it on

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1 and then throw them (inaudible) in the car.

2 OFFICER JOSEPH KEEGAN: (Inaudible).

3 POLICE OFFICER: Yeah.

4 OFFICER JOSEPH KEEGAN: Until ACP gets here?

5 POLICE OFFICER: Yeah, we'll just put in a gun
6 locker and lock it with the cuffs until he gets here.

7 OFFICER JOSEPH KEEGAN: .380?

8 POLICE OFFICER: Joe, can you just grab --

9 OFFICER JOSEPH KEEGAN: What do you need?

10 POLICE OFFICER: (Inaudible).

11 OFFICER JOSEPH KEEGAN: Yeah, there's on in
12 there already. Nothing really up here. What this is,
13 key or something.

14 POLICE OFFICER: There's nothing in there.

15 OFFICER JOSEPH KEEGAN: Nothing in there?

16 POLICE OFFICER: Just lock it with your cuff.

17 OFFICER JOSEPH KEEGAN: (Inaudible).

18 POLICE OFFICER: Yeah.

19 OFFICER JOSEPH KEEGAN: Stand up. Nothing
20 else?

21 KORAN CHAMBERS: No. That's it. No.

22 OFFICER JOSEPH KEEGAN: What's that?

23 KORAN CHAMBERS: (Inaudible).

24 POLICE OFFICER: What's your phone number, man?

25 KORAN CHAMBERS: 718.

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1 POLICE OFFICER: Yeah.

2 KORAN CHAMBERS: (Inaudible).

3 POLICE OFFICER: 17824. 960.

4 OFFICER JOSEPH KEEGAN: I'm going to take this
5 belt off. You know how much money you have on you?

6 KORAN CHAMBERS: No.

7 OFFICER JOSEPH KEEGAN: (Inaudible)?

8 KORAN CHAMBERS: (Inaudible).

9 OFFICER JOSEPH KEEGAN: I'm just saying in
10 general, do you know (inaudible) or not?

11 KORAN CHAMBERS: (Inaudible).

12 OFFICER JOSEPH KEEGAN: Okay, I'm going to
13 (inaudible). Do you have a lot of money on you? Just in
14 general, do you know off the top of your head or not?

15 KORAN CHAMBERS: (Inaudible).

16 OFFICER JOSEPH KEEGAN: I'm going to count --
17 just have to count it and account for it. You have any
18 other money on you?

19 KORAN CHAMBERS: (Inaudible).

20 OFFICER JOSEPH KEEGAN: Just one second. Do
21 you need an ambulance? No medical attention? You good?
22 Spread your legs. This way. Same way. You face me.
23 Just step over a little bit.

24 POLICE OFFICER: 555244.

25 POLICE OFFICER: (Inaudible) the chain off.

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1 OFFICER JOSEPH KEEGAN: Yeah, I'll do it. Just
2 hold onto the rest of this for me, please. This come off
3 straight over your head?

4 KORAN CHAMBERS: (Inaudible).

5 POLICE OFFICER 2: It's got a latch in front.

6 OFFICER JOSEPH KEEGAN: Oh, it does?

7 KORAN CHAMBERS: It's really religious. Not
8 supposed to (inaudible).

9 OFFICER JOSEPH KEEGAN: (Inaudible).
10 Unfortunately, that's something you could use. It's
11 going in the jewelry envelope, all right? Okay. Now, he
12 says he's got more than money in his pocket.

13 POLICE OFFICER: Yeah, (inaudible).

14 POLICE OFFICER: Okay.

15 POLICE OFFICER 2: And this was all in the car
16 (inaudible).

17 OFFICER JOSEPH KEEGAN: All the money that you
18 took off? There any money in your wallet? Money in your
19 phone or anything? Have you step up here real quick, all
20 right? Right there.

21 POLICE OFFICER: (Inaudible).

22 OFFICER JOSEPH KEEGAN: Just so you're on this
23 side. I'm going to count it right now. Denominations
24 out first. 20, 5, 10, 30, 31, 32, 33, 34, 35, 36, 37,
25 38.

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1 POLICE OFFICER: \$38. All right.

2 OFFICER JOSEPH KEEGAN: You have that?

3 KORAN CHAMBERS: You're giving it back?

4 OFFICER JOSEPH KEEGAN: Yeah, we're going to
5 give it back to you. What pocket you want it in?

6 POLICE OFFICER: This is a different address,
7 just so you know.

8 OFFICER JOSEPH KEEGAN: Okay. Thank you.

9 POLICE OFFICER 2: You got the keys?

10 OFFICER JOSEPH KEEGAN: (Inaudible).

11 POLICE OFFICER: Want me to hold it?

12 OFFICER JOSEPH KEEGAN: Yeah, if you don't
13 mind.

14 OFFICER JOSEPH KEEGAN: (Inaudible).

15 POLICE OFFICER: That's an extra bag.

16 OFFICER JOSEPH KEEGAN: You got keys? Yeah.

17 KORAN CHAMBERS: (Inaudible) there?

18 OFFICER JOSEPH KEEGAN: Yeah, I can get you
19 one. Why don't you grab a (inaudible) real quick?

20 POLICE OFFICER: Here it is.

21 OFFICER JOSEPH KEEGAN: we can grab it after.

22 (Inaudible). Turn a little backwards. Put your arm up.

23 POLICE OFFICER 2: (Inaudible) real quick.

24 (Inaudible) socks. (Inaudible) just make sure you got
25 nothing in your socks.

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1 OFFICER JOSEPH KEEGAN: (Inaudible).

2 POLICE OFFICER: All right.

3 OFFICER JOSEPH KEEGAN: Inside out. Let me see
4 the bottom of your foot quick. All right.

5 POLICE OFFICER : Put it back on.

6 KORAN CHAMBERS: My foot's (inaudible).

7 POLICE OFFICER: You'd be surprised where the
8 guys hide (inaudible).

9 KORAN CHAMBERS: (Inaudible).

10 POLICE OFFICER: We'll put you in here quick.
11 I'll grab you a mask. All right? You good?

12 OFFICER JOSEPH KEEGAN: Yeah.

13 POLICE OFFICER: (Inaudible).

14 OFFICER JOSEPH KEEGAN: Yeah, it should be
15 right on the desk. (Inaudible).

16 KORAN CHAMBERS: (Inaudible). This is
17 (inaudible).

18 OFFICER JOSEPH KEEGAN: All right. Just take
19 that hoodie off real quick. I just want to check it one
20 more time -- off you.

21 POLICE OFFICER: You want something to eat,
22 man? Water? Food?

23 KORAN CHAMBERS: No, just --

24 POLICE OFFICER: We'll get you (inaudible).

25 KORAN CHAMBERS: Yeah, (inaudible) --

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1 POLICE OFFICER: Food, something? Like I told
2 you on the street, you treat us good, we treat you good.
3 We'll (inaudible) soon, all right?

4 KORAN CHAMBERS: I'll take a water.

5 POLICE OFFICER: I'll get you water.
6 (Inaudible). If you need something, shout.

7 KORAN CHAMBERS: (Inaudible).

8 OFFICER JOSEPH KEEGAN: Okay. Just stand up
9 one more time for me to check you once more. Face away
10 from me. Spread your legs far as you can. All right.

11 POLICE OFFICER: Just hold on to the jacket --
12 you want to wear your jacket?

13 KORAN CHAMBERS: Yeah.

14 POLICE OFFICER: (Inaudible).

15 DETECTIVE LEVINE: I'm Levine, this is Keegan.
16 All right? I'm Levine. This is Keegan. If you need
17 something, shout.

18 KORAN CHAMBERS: Levine?

19 DETECTIVE LEVINE: I'm Levine, Detective
20 Levine. This is Officer Keegan.

21 KORAN CHAMBERS: And Keegan?

22 OFFICER JOSEPH KEEGAN: Yeah, yeah. We're your
23 AO, arresting officer, okay?

24 KORAN CHAMBERS: (Inaudible).

25 POLICE OFFICER: We'll get you water.

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(Proceedings Concluded)

C E R T I F I C A T E

I, Sonya Ledanski Hyde, certify that the foregoing
transcript is a true and accurate record of the
proceedings.



Veritext Legal Solutions
330 Old Country Road
Suite 300
Mineola, NY 11501

Date: April 24, 2025

Veritext Legal Solutions
330 Old Country Road - Suite 300
Mineola, NY 11501

GRAND JURY TESTIMONY

1 POLICE OFFICER JOSEPH KEEGAN,
2 SHIELD NUMBER 17824, Patrol Borough of Queens South, was
3 called as a witness, having first been duly sworn,
4 testified as follows:

5 BY MR. PILLER:

6 Q. Officer, if you could, I'd like you to take the
7 microphone off and just keep your voice up so we can all
8 hear.

9 I'd like to direct your attention to October 19,
10 2022, between 8:45 p.m. and 9:04 p.m. Are you familiar
11 with that date and time?

12 A. Yes.

13 Q. Were you working on that date?

14 A. Yes.

15 Q. And on that date, what was your assignment? What
16 were you doing?

17 A. I was just patrolling.

18 Q. Were you patrolling on foot or were you in a
19 vehicle?

20 A. We were in a vehicle.

21 Q. Were you with a partner, by yourself?

22 A. I was with a partner, two partners.

23 Q. And while you were patrolling, was your attention
24 drawn to anything?

25 A. Yes.

1 Q. What was your attention drawn to?

2 A. There was a red Jaguar with window tints and no
3 front license plate.

4 Q. And would excessively tinted and omitted front
5 license plate, would those be Vehicle and Traffic Law
6 infractions?

7 A. Yes.

8 Q. After you observed those infractions, what, if
9 anything, did you do?

10 A. Turned on my emergency lights and conducted our
11 car stop on that vehicle.

12 Q. Did the car stop?

13 A. Yes.

14 Q. What was the location of that traffic stop?

15 A. It was 190th Street and Linden Boulevard.

16 Q. Is that in Queens County, New York?

17 A. Yes.

18 Q. Could you keep your voice up louder.

19 A. Sorry.

20 Q. After you stopped the vehicle at 190th Street and
21 Linden Boulevard, did you begin an investigation? Did
22 you get out of your car; what happened?

23 A. Yes, we conducted a car stop, and at that point I
24 asked the driver for his license and registration and
25 just begin what I normally do for any car stop.

1 Q. Aside from the driver, was there anybody else
2 inside of the vehicle?

3 A. No.

4 Q. After you requested that documentation, did the
5 driver provide you with all that documentation?

6 A. Yes, he just provided me with a driver's license,
7 I believe.

8 Q. During the investigation, did the driver tell you
9 where he was going?

10 A. Yeah, he said he was headed home.

11 Q. Did he tell you where his home was or?

12 A. No.

13 Q. Did you ask?

14 A. I don't recall.

15 Q. Aside from the driver license, what other
16 documentation did you request?

17 A. Insurance and registration.

18 Q. What kind of information would the registration
19 tell you?

20 A. Just the make, model, the vehicle and the license
21 plate and vehicle identification number which is the VIN
22 number.

23 Q. Did you make a -- and to be clear, did the driver
24 provide you with that information?

25 A. No, he attempted to, but he didn't provide me

1 with the registration.

2 Q. Did you -- did you make any determination whether
3 this car belonged to him?

4 A. I asked him that I believe.

5 Q. And during your investigation, did you request
6 that the driver step outside of the vehicle?

7 A. Yes.

8 Q. What was your purpose for doing that?

9 A. Just officer safety. So we had a lot of cars
10 take off on us. It was just safer to continue the
11 traffic stop at that point, talk to him outside.

12 Q. After you asked the driver to step outside of the
13 car, did you continue to have a conversation with him?

14 A. Yes.

15 Q. Where did that conversation take place?

16 A. He was standing at the rear of his vehicle with
17 his butt to the bumper, the car facing me. His back was
18 to the vehicle.

19 Q. And during that interaction, did you observe
20 anything on the driver of the vehicle?

21 A. Yes, I observed a bulge that was consistent with
22 a size and shape of a firearm on his left leg. It was
23 like protruding out from where his knee cap was.

24 Q. Could you describe what the bulge looked like?

25 A. To me it looked like a -- consistent with the

1 size and shape of a firearm.

2 Q. What kind of firearm and shape are you talking
3 about?

4 A. Okay, some like kind of like L like, the slide
5 where it meets. Where like this almost look like
6 downward sticking out. Where normally someone jeans you
7 wouldn't see an object protruding out from their knee
8 cap. It was about knee level on the inside.

9 Q. The record would reflect you are indicating a L
10 shape with your hand. Can you stand up and maybe show
11 for the jury where on the leg you saw the bulge?

12 A. He was standing like this and he had jeans on
13 just about tight as mine, maybe a little tighter. It
14 was sticking out like that basically.

15 MR. PILLER: The record will reflect that
16 the officer is indicating the leg above the left
17 knee cap.

18 Q. Did you ask or did any of the other officers ask
19 whether the driver -- let me rephrase that.

20 Did you or any of the officers ask the driver
21 whether he had any weapons on him or anything that he
22 wasn't suppose to have on him?

23 A. Yes.

24 Q. Did the driver respond or did the driver answer
25 that question?

1 A. I don't recall off the top of my head. I think
2 he said, no.

3 Q. After you observed the bulge, what did you do if
4 anything?

5 A. I believe I asked him. I said, what's going on
6 with your jeans down there and he made a face.
7 Basically, he looked down at the bulge I was asking him
8 about. I pointed. I said, what's going on with your
9 jeans down there, man. He kind of did this and he --
10 then he looked up with kind of like a defeated look. I
11 frisked the bulge and felt the firearm.

12 Q. After you felt the firearm where the bulge was,
13 what happened next?

14 A. I signalled to my partner I was working with that
15 day. I said 92 which is a term for arrest. When I said
16 92, when they hear that that means put the person in
17 handcuffs, he is under arrest at that point.

18 Q. And was the driver arrested?

19 A. Yes.

20 Q. After he was arrested, was the object you felt
21 recovered?

22 A. Yes.

23 Q. What was -- what did you recover?

24 A. It was a 380 firearm. It was a Glock 42.

25 Q. Was it loaded?

1 A. Yes.

2 Q. I'm approaching you with a picture that's marked
3 Grand Jury Exhibit Number 1. I'm handing it to you. Do
4 you recognize what I handed to you?

5 A. Yes.

6 Q. How do you recognize it?

7 A. That's the gun from the night we are talking
8 about.

9 Q. Is that the gun you recovered?

10 A. Yes, that's the gun I recovered off the person.

11 Q. Does that picture fairly and accurately reflect
12 the condition and the appearance of the guns that you
13 recovered as well as the ammunition?

14 A. Yes.

15 Q. Where was the ammunition located?

16 A. It was -- there was, I believe, four rounds in
17 the magazine and one in the chamber of the firearm.

18 MR. PILLER: We are moving and receiving
19 into evidence what is marked Grand Jury Exhibit
20 Number 1, and I'm going to publish it to the
21 Grand Jury.

22 Q. Officer, did you learn the name of the person
23 that you arrested?

24 A. Yes.

25 Q. What was his name?

1 A. Koran Chambers.

2 Q. Is Koran Chambers the subject of this Grand Jury
3 investigation?

4 A. Yes.

5 Q. And were you -- at this time during this car
6 stop, were you wearing a body camera?

7 A. Yes.

8 Q. Was your body camera activated?

9 A. Yes.

10 Q. And it was recording?

11 A. Yes.

12 Q. Does your body camera truly and accurately record
13 what is in front of the camera?

14 A. Yes.

15 Q. Does it truly and accurately record both video
16 and audio?

17 A. Yes.

18 Q. I'm approaching you with a white CD that's marked
19 Grand Jury Exhibit Number 2. I'm handing it to you. Do
20 you recognize what I have handed to you?

21 A. Yes.

22 Q. How do you recognize it?

23 A. This is my body worn camera footage.

24 Q. Have you reviewed that CD?

25 A. Yes, in your office.

1 Q. Does that CD contain a true and accurate copy of
2 approximately 24 minutes of your body camera recording?

3 A. Yes.

4 MR. PILLER: Removing and receiving into
5 evidence Grand Jury Exhibit Number 2.

6 Q. Officer, was the firearm, the gun that you
7 recovered, was that vouchered in this case?

8 A. Yes.

9 Q. What does it mean to voucher property?

10 A. It's our department's way of itemizing,
11 accounting for property that's recovered during an
12 arrest or other situations, that our department
13 encounters.

14 Q. In that vouchering process, is property assigned
15 an invoice number?

16 A. Yes.

17 Q. And is that a unique number relating to a
18 specific piece of property? Was the firearm and
19 ammunition given an invoice number in this case?

20 A. Yes.

21 Q. Do you recall what that invoice number is?

22 A. Not off the top of my head.

23 Q. Would a copy of the property clerk's invoice
24 refresh your recollection?

25 A. Yes.

1 Q. I'm handing you a copy of the property clerk's
2 invoice. Can you tell me when -- if your recollection
3 has been refreshed?

4 A. Yes.

5 Q. Can you tell the jury what is the invoice number
6 for the gun and ammunition?

7 A. Yes, it's Invoice Number 4000937358.

8 Q. And after you recovered the gun, was it sent to a
9 -- do you know was it sent to a laboratory for testing;
10 whether the gun was operable?

11 A. Yes.

12 Q. Was it sent for testing?

13 A. I'm not sure. I put in a request for the testing
14 or lab.

15 Q. You don't have personal knowledge it was sent,
16 that's typically what you do?

17 A. Yes, I requested that it be sent. I'm just not
18 sure if it was sent yet.

19 Q. After you arrested Mr. Chambers, do you collect
20 personal information about someone who is arrested?

21 A. Yes.

22 Q. Such as name, date of birth, things like that?

23 A. Yes.

24 Q. And did you determine whether Mr. Chambers had a
25 New York State identification number or a NYSID number?

1 A. Yes.

2 Q. Did he have one?

3 A. Yes.

4 Q. And what is a NYSID number?

5 A. When someone gets fingerprinted, basically give
6 them a number associated with that person.

7 Q. That can be fingerprinted for things like a job
8 application, is that right?

9 A. Yes.

10 Q. Do you have a NYSID number?

11 A. Yes.

12 Q. Do I have a NYSID number?

13 A. I'm sure, yes.

14 Q. And to be clear, did you observe whether Mr.
15 Chambers did have a NYSID number?

16 A. Yes.

17 Q. Did he have one?

18 A. Yes.

19 Q. Do you recall what his NYSID number is?

20 A. Not off the top of my head.

21 Q. Would a copy of the arrest report refresh your
22 recollection?

23 A. Yes.

24 Q. Handing a copy of the arrest report, please let
25 us know when your recollection has been refreshed.

1 A. Yes.

2 Q. What is Mr. Chambers NYSID number?

3 A. It is 190434K.

4 Q. And what is his date of birth?

5 A. Date of birth is 11/15/1988.

6 Q. Did you eventually test the windows to determine
7 how much they were tinted?

8 A. No -- yes.

9 Q. Do you use any kind of device when you do that?

10 A. Yes, we use a tint meter.

11 Q. I'm approaching you with a picture that's marked
12 Grand Jury Exhibit Number 3. Do you recognize what I'm
13 handing you?

14 A. Yes.

15 Q. How do you recognize it?

16 A. This is a photo that I took of a tint meter
17 testing the vehicle that we are talking about, its
18 window tint.

19 Q. Does that picture truly and accurately reflect
20 the tint meter of the red Jaguar vehicle that you tested
21 as well as the tint meter reading?

22 A. Say that again.

23 Q. Does that picture fairly and accurately depict
24 the car that we have been talking about, the red
25 Jaguar's window, and the tint meter as well as the

1 reading on the tint meter?

2 A. Yes.

3 MR. PILLER: Removing and receiving into
4 evidence Grand Jury Exhibit Number 3.

5 Q. Can you tell us how does that tint meter work?
6 How do you read the tint meter?

7 A. So it gives a light transmittance basically
8 saying how much light is allowed through and gives off
9 the number on there. Basically, slide on the window to
10 get a reading how dark or how light the window tint
11 actually is.

12 Q. What was the reading on the tint meter when you
13 tested it?

14 A. Twenty-two.

15 Q. Did you test all of the windows on the car?

16 A. All but the driver window.

17 Q. Did all the windows read 22?

18 A. No, I think the other two might have read a
19 different number.

20 Q. Do you recall what that number was?

21 A. I think it was 26. I have to check to be sure.

22 Q. In the 20s?

23 A. In the 20s, yes.

24 Q. So the reading of 22 does that mean 22 percent of
25 light is able to pass through the window?

1 A. Yes.

2 MR. PILLER: At this time it's 12:55. I
3 think we are going to stop for lunch. Officer,
4 you can step down for now.

5 JUROR: He stated that he attempted to give
6 him a registration; however, he did not receive
7 one. What does he mean by attempted, the
8 officer?

9 MR. PILLER: So it's a question from the
10 witness.

11 JUROR: Yes.

12 MR. PILLER: So briefly, we'll continue this
13 witness's testimony later this afternoon. So
14 hold your questions until the end and we'll ask
15 those questions when we return this afternoon.
16 Thank you.

17 For now we're breaking for lunch. Officer,
18 will you step down first.

19 (WITNESS EXCUSED)

20

21 MR. PILLER: At this time, we're going to
22 continue the case to later this afternoon. Any
23 questions you have about -- questions you have
24 for the witness or any questions you have about
25 the law, you can ask those questions at the end.

1 **For now we are going to break. In the meantime,**
2 **please do not discuss or deliberate on this case**
3 **until I have had an opportunity to present**
4 **additional evidence and charge you on the law.**

5 **Thank you.**

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1 POLICE OFFICER JOSEPH KEEGAN,
2 was recalled as a witness, having previously been duly
3 sworn, testified further as follows:

4 BY MR. PILLER:

5 MR. PILLER: Madam Foreperson, would you
6 please remind the witness he is still under oath.

7 FOREPERSON: Officer, you are still under
8 oath.

9 MR. PILLER: You are under the same oath
10 that you took earlier this afternoon.

11 THE WITNESS: Yes.

12 Q. Officer, I want to direct your attention back to
13 the incident you testified about earlier on October 19,
14 2022, between 8:45 p.m. and 9:04 p.m. in Queens County.
15 After you arrested Koran Chambers, was an arrest number
16 assigned to that arrest?

17 A. Yes.

18 Q. Do you recall what that arrest number was?

19 A. Not off the top of my head.

20 Q. Would a copy of the complaint refresh your
21 recollection of the arrest number?

22 A. Yes.

23 Q. Handing you a copy of the complainant, please let
24 me know when your recollection has been refreshed.

25 A. Yes.

1 Q. What is the arrest number in this case?

2 A. It is Q22633436.

3 MR. FILLER: I am holding in my hand a
4 one-page document that I have marked as Grand
5 Jury Exhibit Number 4. Reading from the
6 document: New York City Police Department Police
7 Laboratory Firearms Analysis Laboratory Report.
8 Invoice number 4000937358. Defendant Koran
9 Chambers. At the bottom there is a
10 certification: I hereby certify that I
11 tested/examined/analyzed the above described
12 items and that this report is an original report
13 made by me. False statements made herein are
14 punishable as a Class A misdemeanor pursuant to
15 Section 210.45 of the New York State Penal Law.
16 It is signed by Officer Didonato. Tax number
17 948888. Date prepared October 24, 2022.

18 We are moving and receiving into evidence
19 Grand Jury Exhibit Number 4. Reading from the
20 document in pertinent part: Type of analysis:
21 Firearms examination. Invoice item one, pistol
22 380 auto caliber semi-automatic Glock model 42.
23 Item number two, case cartridge 380 auto caliber
24 Winchester jacketed hollow point. Item three,
25 magazine 380 caliber auto caliber, capacity 6.

1 Invoice item number four, case cartridge 380
2 caliber Winchester jacketed hollow point.
3 Results of examination/analysis: Pistol was test
4 fired utilizing submitted and laboratory
5 ammunition. Pistol and the utilized submitted
6 ammunition were found be operable.

7 I am holding a one-page document marked as
8 Grand Jury Exhibit Number 5. It is a fingerprint
9 analysis. There is a certification at the
10 bottom: This report consists of one page. It
11 is hereby certified that it is a true and
12 unaltered copy transmitted and certified by
13 Kimberly Tomlinson.

14 Moving and receiving into evidence Grand
15 Jury Exhibit Number 5. Reading from the
16 document:

17 I hereby certify that I am employed by the
18 New York State Division of Criminal Justice
19 Services, the Division, and that I am a public
20 servant, Identification Specialist II, charged
21 with the custody of official fingerprint records,
22 in that I am assigned to the State Identification
23 Bureau, which serves as the State's central
24 repository of fingerprint cards and criminal
25 history records.

1 I further certify that the fingerprint
2 impressions recorded on the arrest fingerprint
3 card maintained by the Division, bearing the
4 following information:

5 NAME: CHAMBERS, KORAN.

6 NYSID: 00190434K.

7 DATE OF ARREST: 10/19/22.

8 ARREST NUMBER: Q22633436.

9 Were compared by me with the fingerprint
10 impressions recorded on the arrest fingerprint
11 card maintained by the Division, bearing the
12 following information:

13 NAME: CHAMBERS, KORAN.

14 NYSID: 00190434k.

15 DATE OF ARREST: 4/18/13.

16 ARREST NUMBER: Q13623021.

17 I determined from my comparison of the
18 fingerprint impressions, recorded on the above
19 arrest fingerprint cards, that the fingerprint
20 impressions are those of the same individual.

21 There is the signature of Kimberly M.
22 Tomlinson, Identification Specialist II. Dated
23 October 25, 2022.

24 I am holding in my hand a two-page document
25 marked as Grand Jury Exhibit Number 6. It is a

1 Certificate of Disposition. There is a
2 certification: I hereby certify that it appears
3 from an examination of the records on file in
4 this office that on January 9, 2014, the
5 above-named defendant was convicted of the crimes
6 below. At the bottom it states in witness
7 whereof, I have hereunto set my hand and affixed
8 my officia seal on this date, October 24, 2022.
9 There is the signature of the court clerk with
10 the raised seal of the court.

11 We are moving and receiving into evidence
12 Grand Jury Exhibit Number 6. Reading from the
13 document in pertinent part: The People of the
14 State of New York versus Koran Chambers,
15 Defendant. NYSID number 190434K. Arrest number
16 Q13623021. Date of arrest April 18, 2013. Date
17 of birth November 15, 1988.

18 That on February 21, 2014, upon the
19 aforesaid conviction by plea, to Attempted
20 Burglary in the Second Degree, under Penal Law
21 Section 110/140.25-2 the judge sentenced the
22 defendant and sentence was imposed.

23 Q. Officer, I would like to follow up on your
24 testimony from earlier about the registration. We had a
25 question from a Grand Juror before we took a break for

1 lunch. When you asked the driver of the vehicle for
2 registration, did they show you any paper registration?

3 A. No.

4 Q. And did they indicate that their registration was
5 electronic, where they had an electronic copy?

6 A. He was trying to show me his electronic copy for
7 his insurance card.

8 Q. Did you see the registration that he was in the
9 process of showing you?

10 A. He told me it was on the windshield.

11 Q. Did he pull up anything on his phone?

12 A. Not in regards to the registration.

13 Q. Did he pull up anything on his phone in regards
14 to something else?

15 A. He was trying to get his insurance up, but I
16 didn't look at it.

17 Q. Did you charge him with not having registration?

18 A. No.

19 MR. PILLER: At this point we are going to
20 publish Grand Jury Exhibit Number 2. I am
21 putting Grand Jury Exhibit Number 2 into the
22 computer. I am going to play the file called BWC
23 Keegan. I have opened the file.

24 Q. Officer, would you step down for a moment or can
25 you see the screen from there? Can you see the time

1 stamp?

2 A. Yes.

3 Q. On the top right corner there is a date and time
4 stamp for October 19, 2022, at 20:44. Does that date
5 and time stamp accurately reflect the date and time of
6 this recording?

7 A. Yes.

8 Q. And 20:44, would that be 8:44 p.m.?

9 A. Yes.

10 MR. PILLER: I am going to skip ahead to
11 20:45:27.

12

13 (WHEREUPON, A VIDEO WAS PLAYED FOR THE
14 MEMBERS OF THE GRAND JURY.)

15

16 MR. PILLER: I am pausing the video at
17 20:46:37.

18 Q. Officer, was there any license plate on the front
19 of this vehicle that you stopped?

20 A. No.

21 Q. Was there any plate on the rear of the vehicle?

22 A. Yes.

23 MR. PILLER: I am going to skip ahead in the
24 in video to 20:59:45.

25

1 (WHEREUPON, A VIDEO WAS PLAYED FOR THE
2 MEMBERS OF THE GRAND JURY.)

3
4 Q. Officer, at this point in this video, do you
5 recall what, if anything, you were doing?

6 A. Yes. At this point I was running the defendant's
7 Client ID number.

8 Q. What is a Client ID number?

9 A. That is the number associated with your driver's
10 license, or if you don't have a driver's license, it
11 gets generated if you were written a ticket or anything
12 like that.

13 Q. With respect to this investigation, what kind of
14 information were you looking for based on the driver's
15 Client ID number?

16 A. Just to see if he had a suspended license or if
17 his license was good basically at that point.

18 Q. Did you get any information when you made that
19 inquiry or that search with the Client ID?

20 A. At that point no, it wasn't loading for me on my
21 phone.

22 Q. Was there a problem with the technology?

23 A. Yes, I believe so.

24 MR. PILLER: I am going to resume the video.

25

1 (WHEREUPON, A VIDEO WAS PLAYED FOR THE
2 MEMBERS OF THE GRAND JURY.)
3

4 MR. PILLER: I am pausing the video at
5 21:02:27.

6 Q. Officer, can you describe what just happened or
7 what just occurred?

8 A. While conducting my car stop he was -- when I
9 first did the car stop, he wasn't sweating, and then
10 throughout the car stop he was profusely sweating. He
11 was wiping his face, very uneasy. And when I continued
12 observing him, I could see there was a bulge that looked
13 like it was a firearm poking out from his jeans. So I
14 asked him what is going on with your jeans down there.
15 He continued -- he didn't answer me, he gave me a look.
16 I frisked that area and I felt a gun. And then we
17 arrested him and took the gun off him at that point.

18 Q. Officer, I have no further questions.

19 MR. PILLER: Do any Members of the Grand
20 Jury have any questions for the witness?

21 JUROR: Was the gun licensed or registered
22 to the subject or anyone?

23 Q. Officer, did Mr. Keegan have any gun permit or
24 conceal carry permit?

25 A. No.

1 Q. Did you do a -- did you or one of the officers
2 search the gun -- do a search of the serial number to
3 determine if it was licensed to anybody?

4 A. No, we did a search, but it didn't come back as
5 licensed to anyone.

6 Q. Did the search come back to Koran Chambers?

7 A. No, I don't believe so.

8 MR. PILLER: Do any Members of the Grand
9 Jury have any questions?

10 JUROR: I am a little confused as to the
11 tint, because it looked like the windows were
12 open. So at what point during the questions are
13 they talking about the percent of tint and legal?
14 I would like to understand that a little bit
15 better, and the term of what percent did he have?
16 Was it illegal tints? Could you clarify that?

17 MR. PILLER: Okay. Is that it?

18 JUROR: Did they ever found out if the car
19 was his or not?

20 MR. PILLER: The first question is about the
21 window tints and what percentage is legal or not
22 legal. That is a legal question, and at the end
23 of all of the evidence, I will instruct you on
24 the law and I will instruct you on the statute
25 section for tinted windows.

1 The other question was about the vehicle.

2 Q. Officer, did you make a determination whether the
3 vehicle was stolen or not?

4 A. Yes.

5 Q. And was it stolen?

6 A. No, it was not stolen.

7 Q. Did the vehicle belong to Mr. Chambers?

8 A. Yes, it did.

9 MR. PILLER: Are there any other questions?

10 Madam Foreperson, are there any questions
11 for the witness?

12 FOREPERSON: No.

13 MR. PILLER: Seeing no hands and hearing no
14 voices, you may step down, Officer.

15

16

17 (WITNESS EXCUSED)

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**JURISDICTIONALLY DEFECTIVE
INDICTMENT**

I N D I C T M E N T

S U P R E M E C O U R T O F T H E S T A T E O F N E W Y O R K
C O U N T Y O F Q U E E N S

THE PEOPLE OF THE STATE OF NEW YORK

AGAINST

KORAN CHAMBERS - AFO, VFO
DEFENDANT
CR-026148-22QN
NYSID# 00190434K

FILED: OCT 31 2022
INDICTMENT NO. 1844/2022
IND - 73253-22

PL 265.03-1B CRIMINAL POSSESSION OF A WEAPON IN THE SECOND
DEGREE (1)
PL 265.03-3 CRIMINAL POSSESSION OF A WEAPON IN THE SECOND
DEGREE (2)
PL 265.02-1 CRIMINAL POSSESSION OF A WEAPON IN THE THIRD
DEGREE (3)
VTL 375-12A-B OPERATING A MOTOR VEHICLE WITH A TINTED WINDOW
(4)
VTL 402-1-A OPERATING, DRIVING OR PARKING A MOTOR VEHICLE
WITHOUT PROPER LICENSE PLATES (5)



DISTRICT ATTORNEY

FIRST COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A WEAPON IN THE SECOND
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT OCTOBER 19, 2022 IN THE COUNTY OF
QUEENS, KNOWINGLY POSSESSED A LOADED PISTOL, WITH INTENT TO USE
UNLAWFULLY AGAINST ANOTHER.

THE SUBJECT MATTER OF THIS COUNT BEING AN ARMED FELONY AS THAT
TERM IS DEFINED IN SECTION 1.20 OF THE CRIMINAL PROCEDURE LAW.

SECOND COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A WEAPON IN THE SECOND
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT OCTOBER 19, 2022 IN THE COUNTY OF
QUEENS, KNOWINGLY POSSESSED A LOADED PISTOL, AND SUCH POSSESSION WAS
NOT IN HIS HOME OR PLACE OF BUSINESS.

THE SUBJECT MATTER OF THIS COUNT BEING AN ARMED FELONY AS THAT
TERM IS DEFINED IN SECTION 1.20 OF THE CRIMINAL PROCEDURE LAW.

THIRD COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF CRIMINAL POSSESSION OF A WEAPON IN THE THIRD
DEGREE COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT OCTOBER 19, 2022 IN THE COUNTY OF
QUEENS, KNOWINGLY AND UNLAWFULLY POSSESSED A LOADED PISTOL.
THIS ACT CONSTITUTES A FELONY.

FOURTH COUNT

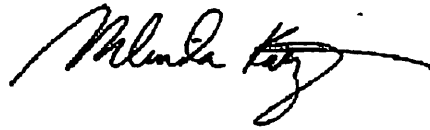
THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF OPERATING A MOTOR VEHICLE WITH A TINTED
WINDOW COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT OCTOBER 19, 2022 IN THE COUNTY OF
QUEENS, OPERATED A MOTOR VEHICLE UPON A PUBLIC HIGHWAY, ROAD OR STREET
AND THAT WAS CLASSIFIED AS A STATION WAGON, SEDAN, HARDTOP, COUPE,
HATCHBACK OR CONVERTIBLE AND HAD A REAR SIDE WINDOW THAT HAD A LIGHT
TRANSMITTANCE OF LESS THAN SEVENTY PERCENT.

FIFTH COUNT

THE GRAND JURY OF THE COUNTY OF QUEENS BY THIS INDICTMENT,
ACCUSES THE DEFENDANT OF OPERATING, DRIVING OR PARKING A MOTOR VEHICLE
WITHOUT PROPER LICENSE PLATES COMMITTED AS FOLLOWS:

THE DEFENDANT, ON OR ABOUT OCTOBER 19, 2022 IN THE COUNTY OF
QUEENS, OPERATED, DROVE OR PARKED A MOTOR VEHICLE ON A PUBLIC HIGHWAY
WITHOUT SUCH VEHICLE HAVING A DISTINCTIVE NUMBER ASSIGNED TO IT BY THE
COMMISSIONER AND A SET OF NUMBER PLATES ISSUED BY THE COMMISSIONER
WITH A NUMBER AND OTHER IDENTIFICATION MATTER IF ANY, CORRESPONDING TO
THAT OF THE CERTIFICATE OF REGISTRATION CONSPICUOUSLY DISPLAYED, ONE
ON THE FRONT AND ONE ON THE REAR OF SUCH VEHICLE, EACH SECURELY
FASTENED SO AS TO PREVENT THE SAME FROM SWINGING AND PLACED, WHENEVER
REASONABLY POSSIBLE, NOT HIGHER THAN FORTY-EIGHT INCHES AND NOT LOWER
THAN TWELVE INCHES FROM THE GROUND.

A handwritten signature in black ink, appearing to read 'Melinda Katz', with a stylized flourish extending from the end.

MELINDA KATZ
DISTRICT ATTORNEY